

May 6, 2005

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Ms. Camille Hueni Remedial Project Manager (6SF-AT) U.S. Environmental Protection Agency Region VI Wells Fargo Bank Tower @ Fountain Place 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re: 2004 Long-Term Operations and Maintenance Annual Report (Soil Remedy)
South Cavalcade Superfund Site – Concrete Cap

Dear Ms. Hueni:

This letter and attachments serve as the 2004 Long-Term Operations and Maintenance Annual Report (Report) for the soil remedy of the South Cavalcade Site (Site) located in Houston, Texas. This Report is submitted to the Environmental Protection Agency (EPA) as required by the Remedial Action Work Plan for the South Cavalcade Site on behalf of Beazer East, Inc.

The intent of this Report is to describe the condition of the Site, delineate operation and maintenance activities completed during the year, detail proposed activities for the next year, and certify that the remedy continues to provide the protection specified by the Amended Record of Decision (ROD) dated June 27, 1997. This protection includes providing a barrier protective of human health and the environment by removing exposure pathways.

Completed Maintenance Activities

Current property owners and site personnel were contacted to review maintenance activities that were performed during the past year as well as activities that are planned for the coming year. Property owners'/ lessees representatives that were contacted include the following:

- Palletized Trucking Inc. Mr. Mike King
- American Warehouses Inc. Mr. Tony Carter
- Freeman (formerly Sullivan Transfer) Mr. Kevin O'Brien
- Retec Mr. Jeff Gilman

URS Corporation 9801 Westheimer, Suite 500 Houston, TX 77042 Tel: 713.914.6699 Fax: 713.789.8404

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Mr. O'Brien, of Freeman, and Mr. Gilman, of Retec, were contacted for general site-wide operational information. They indicated that no changes had occurred on the Site from the previous year. Based on the phone interviews with current property owners and site personnel, site maintenance and operational changes to the concrete capped area were limited and none of the maintenance activities performed affected the performance of the concrete cap as a remedial design.

Within the next year, it is anticipated that the City of Houston will commence construction of the Hardy Toll Road expansion in the vicinity of the Site. Mr. King stated that in July 2004 the nearby area was surveyed for this expansion. According to current available design and alignment information, this future vicinity activity is not anticipated to affect the existing soil remedy.

Site Inspection and Proposed Maintenance Activities

A site inspection of the concrete cap was performed on October 11, 2004. As previously described, the current property owners and site personnel were contacted prior to the inspection and interviewed concerning the past year's operations and maintenance activities.

The condition of the concrete cap at the Site in both the southeast and southwest areas is generally very good. No significant cracking (i.e. cracking other than what is typically associated with curing) or spalling was observed on most of the cap. The joint systems appear to be primarily intact and functioning as designed. The attached photos are indicative of typical concrete cap conditions. Inspection of the exterior of on-site manholes and the stormwater detention basin was performed and the typical condition is depicted in the attached photos. Review of the interior of the stormwater inlets indicates that there has been some sediment buildup in the boxes, but flow into the storm drainage pipes appears to be unobstructed.

Based on the results of the property owner and site inspection, limited additional maintenance should be performed at the site. A few joints in the southeast area have become dislodged along the west edge of the cap. It was evident that additional joint sealant material had been placed through the cap, but locations were identified which continued to need repair. The southeast area also has some minor weed growth occurring along the eastern joint before the slope pavement and along the property boundary. It is recommended to remove the weeds, by using appropriate weed removal spray, and to determine if the joint needs to be repaired. These minor maintenance issues will not affect the performance of the design remedy with respect to its ability to provide the protection specified by the ROD. By copy of this letter report, the appropriate property owners are notified of the maintenance issues listed.

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- · Repair joints where needed; and
- Remove weeds by use of spray, determine cause, and make necessary repairs.

This letter serves to certify that the remedy continues to provide the protection specified by the ROD for the Site. If you have any questions or would like additional information concerning the Site inspection please contact Elizabeth Brown at 713.914.6699.

Sincerely,

URS CORPORATION

Elizabeth Brown, EIT

Inspection Manager

cc: Carol Dye - TCEQ

Mike King - Palletized Trucking, Inc.

Tony Carter - American Warehouses, Inc.

Mike Bollinger – Beazer East, Inc.

James Zubrow - Key Environmental, Inc.

SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Photo No.

Date: 10-11-04

Direction Photo Taken:

To the west.

Description:

Photo shows on-site tire shop and typical condition of cap pavement and joint system. In basin 4 of the southeast area at the approximate location of cap and pavement.



South Cavalcade

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Photo No. Date:

2

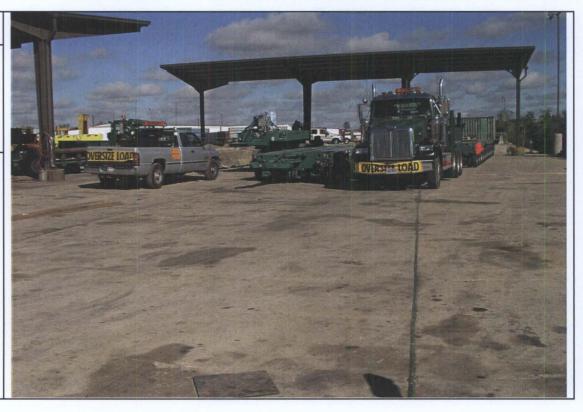
10-11-04

Direction Photo Taken:

To the north.

Description:

Photo shows basin 4 of southeast area concrete and joints.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Site Location:

South Cavalcade

URS 25008644

Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the east.

Description:

Basin 4 concrete cap and joint. Photo also shows typical use of cap in southeast area.

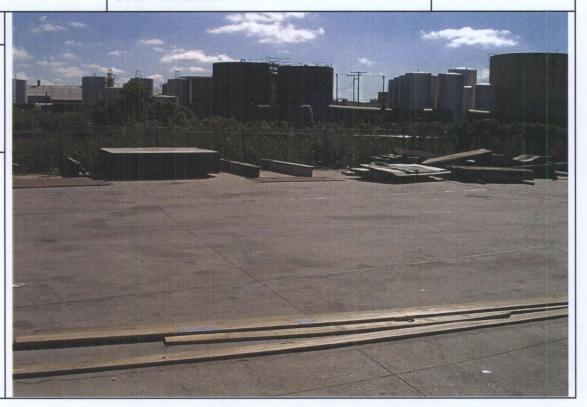


Photo No.

1

Date: 10-11-04

Direction Photo Taken:

Towards the north.

Description:

From basin 4 in southeast area along existing pavement and concrete cap edge.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the northwest.

Description:

Near basin 4 and 3 interface along eastern property line in southeast area. Cap area shown is being used for storage.



South Cavalcade

URS 25008644



Photo No. Date:

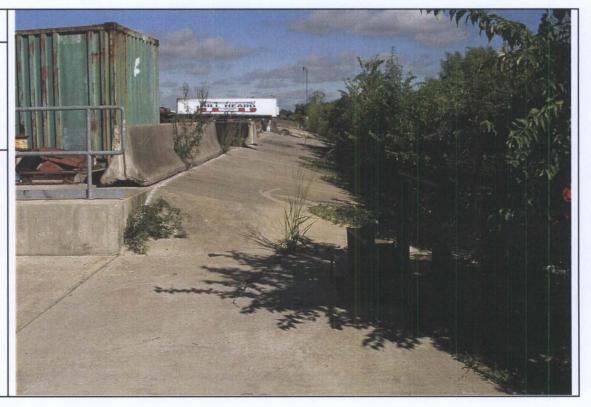
10-11-04

Direction Photo Taken:

Towards the north.

Description:

At basin 3 in southeast area along slope pavement near property line. Concrete is in good condition.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Site Location:

URS 25008644

Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the north.

Description:

Photo taken along slope pavement in southeast area at the existing utility box location. On the left, photo shows a location of weed problem occurring along the eastern joint.

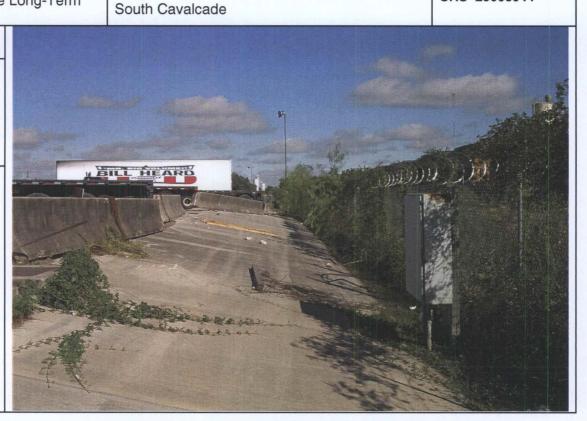


Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the south.

Description:

From basin 3 in southeast area along property line. Photo shows slope paving.



Photo No.

9

SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Date: 10-11-04

Direction Photo Taken:

Towards the south.

Description:

From basin 1 towards basin 2 in southeast area along the edge of existing pavement and concrete cap.



South Cavalcade

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Photo No. Date:

10 No. Date:

Direction Photo Taken:

Towards the south.

Description:

Photo shows joint between concrete cap and previously existing concrete pavement in southeast area. The joint material has detached and come out of the joint.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Site Location:

URS 25008644

Photo No. 11

Date: 10-11-04

Direction Photo Taken:

Towards inlet.

Description:

Photo shows typical condition of stormwater inlets and concrete joint material surrounding inlets.

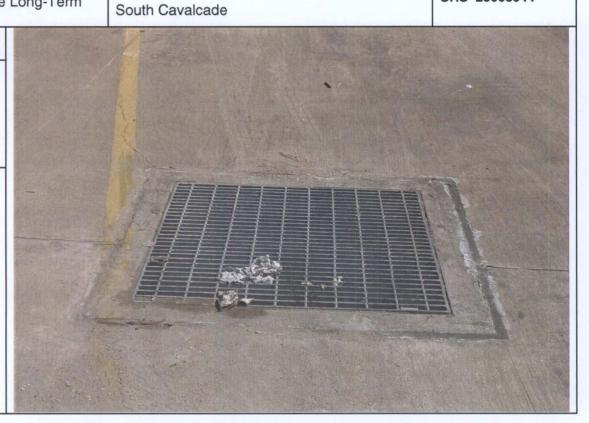


Photo No.

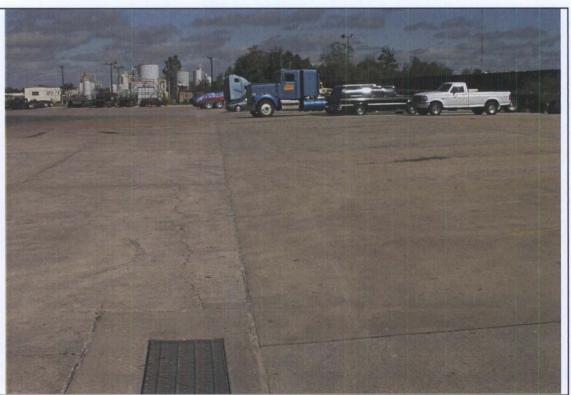
Date: 10-11-04 12

Direction Photo Taken:

Towards the north.

Description:

From basin 2 towards basin 1. In southeast area. Photo shows stormwater inlet and condition of concrete cap (to the right).



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report Photo No.

Date: 10-11-04

Direction Photo Taken:

13

Towards the south.

Description:

From basin 3 towards basin 4 in southeast area. Photo shows concrete cap and joint.



South Cavalcade

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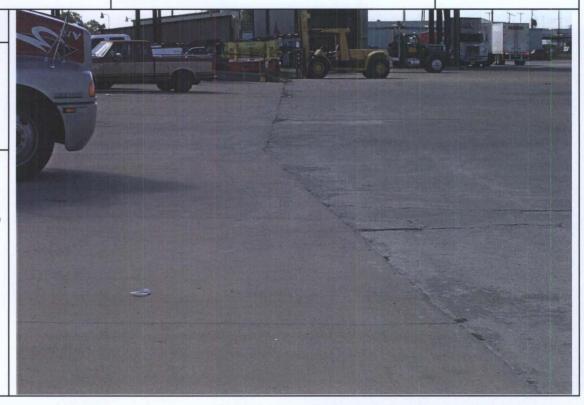


Photo No.

Date: 10-11-04 14

Direction Photo Taken:

Along cap.

Description:

Photo shows typical condition of manholes in southeast area.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

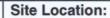
Photo No. Date: 10-11-04 15

Direction Photo Taken:

Towards joint.

Description:

Photo shows typical joints of concrete cap. Some minor spalling has occurred at joints. Spalling pattern is typical of concrete construction.



South Cavalcade

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Photo No. Date: 16

10-11-04

Direction Photo Taken:

Towards the south.

Description:

Photo taken along existing pavement edge with concrete cap. Typical use of cap in southeast area for parking is shown.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Site Location:

South Cavalcade

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Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the east.

Description:

Shows concrete cap in southeast area. Photo is taken from the northern end of Basin 1.

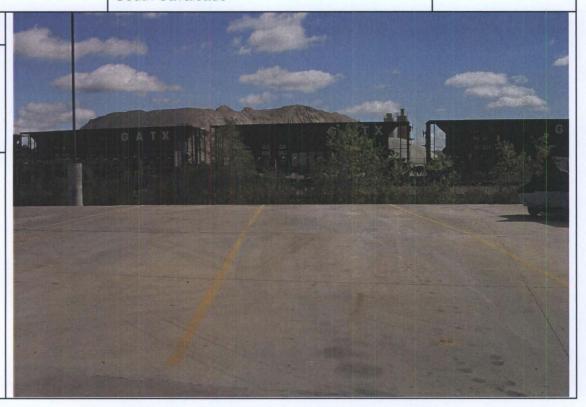


Photo No. Date:

18 10-11-04

Direction Photo Taken:

Towards the south.

Description:

Photo shows slope pavement that connects to concrete cap at the northern end of concrete cap in the southeast area (Basin 1).



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Photo No. 19

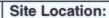
Date: 10-11-04

Direction Photo Taken:

Towards the east.

Description:

Photo taken on the concrete cap in the southwest area. Photo shows protective bollards in the northeast corner of cap.



South Cavalcade

URS 25008644



Photo No. Date: 20

10-11-04

Direction Photo Taken:

Towards the north.

Description:

Photo taken in southwest area shows stormwater inlet.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report
Photo No. Date:

Date: 10-11-04

Direction Photo Taken:

21

Towards the north.

Description:

Photo taken along the southern edge of concrete cap in the southwest area. Joint is in good condition.



South Cavalcade

URS 25008644



Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the east.

Description:

Photo taken along the southern edge of concrete cap in the southwest area.



SITE PHOTOGRAPHS

Project Name/ Client:

2004 South Cavalcade Long-Term

O&M Annual Report

Site Location:

South Cavalcade

URS 25008644

Photo No.

Date: 10-11-04

Direction Photo Taken:

Towards the northeast.

Description:

Photo taken along slope pavement in southeast area at the existing utility box location. Photo shows ponding water along eastern property line. Photo also shows additional location of weed problem.

